

1 ROGER P. CROTEAU, ESQ.  
Nevada Bar No. 4958  
2 TIMOTHY E. RHODA, ESQ.  
Nevada Bar No. 7878  
3 ROGER P. CROTEAU & ASSOCIATES, LTD.  
9120 West Post Road, Suite 100  
4 Las Vegas, Nevada 89148  
(702) 254-7775  
5 (702) 228-7719 (facsimile)  
[croteaulaw@croteaulaw.com](mailto:croteaulaw@croteaulaw.com)  
6 *Attorney for Defendant*  
THUNDER PROPERTIES, INC.  
7

8 UNITED STATES DISTRICT COURT  
9 DISTRICT OF NEVADA

10 \*\*\*

11 BANK OF AMERICA, N.A., )

12 Plaintiff, )

13 vs. )

14 THE SIENA HOMEOWNER'S )  
ASSOCIATION; THUNDER PROPERTIES, )  
15 INC.; and HAMPTON & HAMPTON )  
COLLECTIONS, LLC, )

16 Defendants. )  
17

Case No. 3:16-cv-00188-MMD-CBC

18 **STIPULATION AND ORDER TO EXTEND TIME TO RESPOND TO**  
19 **SECOND MOTION FOR SUMMARY JUDGMENT**  
**(Third Request)**

20 COMES NOW, Defendant, THUNDER PROPERTIES, INC. and Plaintiff, BANK OF  
21 AMERICA, N.A., by and through their undersigned counsel, and hereby stipulate and agree as  
22 follows:

- 23 1. On November 19, 2018, Plaintiff filed a Second Motion for Partial Summary  
24 Judgment herein [ECF #85]. Defendant's Response to said Motion was originally  
25 due on December 17, 2018.
- 26 2. Pursuant to a Stipulation and order to Extend Time to Respond to Second Motion  
27 for Summary Judgment (Second Request) filed on January 7, 2019 [ECF #92],  
28

and granted on January 9, 2019 [ECF #94], Thunder Properties, Inc.'s Response to said Motion is presently due on January 28, 2019.

3. The parties are presently engaged in settlement discussions and prefer to devote their time and resources to an effort to amicably resolve the instant matter. The parties believe that they are very close to an agreement that would resolve the matter in its entirety.

4. Defendant shall have an additional extension of time until February 15, 2019, in which to respond to the Plaintiff's Second Motion for Summary Judgment.

5. This Stipulation is made in good faith and not for purpose of delay.

Dated this 28<sup>th</sup> day of January, 2019.

ROGER P. CROTEAU &  
ASSOCIATES, LTD.

AKERMAN, LLP

/s/ Timothy E. Rhoda  
TIMOTHY E. RHODA, ESQ.  
Nevada Bar No. 7878  
9120 West Post Road, Suite 100  
Las Vegas, Nevada 89148  
(702) 254-7775  
[croteaulaw@croteaulaw.com](mailto:croteaulaw@croteaulaw.com)  
*Attorney for Defendant  
Thunder Properties, Inc.*

/s/ Jamie K. Combs  
JAMIE K. COMBS, ESQ.  
Nevada Bar No. 13088  
1635 Village Center Circle, Suite 200  
Las Vegas, NV 89134  
(702) 634-5000  
[jamie.combs@akerman.com](mailto:jamie.combs@akerman.com)  
*Attorney for Plaintiff  
Bank of America, N.A.*

IT IS SO ORDERED.

By:   
Judge, U.S. District Court

Dated: January 28, 2019

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that on this 28<sup>th</sup> day of January, 2019, I served via the United States District Court CM/ECF electronic filing system, the foregoing **STIPULATION AND ORDER TO EXTEND TIME TO RESPOND TO SECOND MOTION FOR SUMMARY JUDGMENT (Third Request)** to the following parties:

Melanie D Morgan  
Akerman LLP  
1635 Village Center Circle, Suite 200  
Las Vegas, NV 89134  
(702)634-5005  
(702) 380-8572 (fax)  
[melanie.morgan@akerman.com](mailto:melanie.morgan@akerman.com)  
*Attorney for Plaintiff*  
*Bank of America, N.A.*

Christopher V. Yergensen  
Nevada Association Services, Inc.  
6224 West Desert Inn Road  
Las Vegas, NV 89146  
702-804-8885  
702-804-8887 (fax)  
[chris@nas-inc.com](mailto:chris@nas-inc.com)  
*Attorneys for Defendant*  
*Hampton & Hampton Collections, LLC*

Jaimie K. Combs  
Akerman LLP  
1635 Village Center Circle, Suite 200  
Las Vegas, NV 89134  
702-634-5000  
702-380-8572 (fax)  
[jaimie.combs@akerman.com](mailto:jaimie.combs@akerman.com)  
*Attorney for Plaintiff*  
*Bank of America, N.A.*

Joseph P Garin  
Lipson Neilson Cole Seltzer & Garin, P.C.  
9900 Covington Cross Drive  
Suite 120  
Las Vegas, NV 89144  
702-382-1500  
702-382-1512 (fax)  
[NVECF@lipsonneilson.com](mailto:NVECF@lipsonneilson.com)  
*Attorneys for Defendant*  
*The Siena Homeowners Association*

William Shane Habdas  
Akerman LLP  
1635 Village Center Circle, Suite 200  
Las Vegas, NV 89134  
702-634-5000  
702-380-8572 (fax)  
[jaimie.combs@akerman.com](mailto:jaimie.combs@akerman.com)  
*Attorney for Plaintiff*  
*Bank of America, N.A.*

Kaleb D. Anderson  
Lipson Neilson Cole Seltzer & Garin  
9900 Covington Cross Dr.  
Suite 120  
Las Vegas, NV 89144  
(702) 382-1500  
(702) 382-1512 (fax)  
[kanderson@lipsonneilson.com](mailto:kanderson@lipsonneilson.com)  
*Attorneys for Defendant*  
*The Siena Homeowners Association*

Brandon E. Wood  
The Clarkson Law Group, P.C.  
2300 West Sahara Avenue, Suite 950  
Las Vegas, NV 89102  
702-462-5700  
702-446-6234 (fax)  
[bwood@the-clg.com](mailto:bwood@the-clg.com)  
*Attorneys for Defendant*  
*Hampton & Hampton Collections, LLC*

Amber M. Williams  
Lipson Neilson Cole Seltzer & Garin  
9900 Covington Cross Dr., Ste. 120  
Las Vegas, NV 89144  
702-382-1500  
702-382-1512 (fax)  
[awilliams@lipsonneilson.com](mailto:awilliams@lipsonneilson.com)  
*Attorneys for Defendant*  
*The Siena Homeowner's Association*

/s/ Timothy E. Rhoda  
An employee of ROGER P. CROTEAU &  
ASSOCIATES, LTD.